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22 **UNITED STATES DISTRICT COURT**

23 **DISTRICT OF NEVADA**

24 FREMONT EMERGENCY SERVICES
25 (SCHERR), LTD.;

26 Plaintiff,
27 vs.
28 UNITEDHEALTHCARE INSURANCE
29 COMPANY and UNITED
30 HEALTHCARE SERVICES, INC.,
31 Defendants.

32 Case No. 2:22-cv-01118-CDS-BNW

33 *Stipulation and [Proposed] Order to
34 Extend Deadlines for Plaintiff's Response
35 and Defendants' Reply to Defendants'
36 Motion to Stay*

37 Plaintiff, Fremont Emergency Services (Scherr), Ltd. (hereafter, "Plaintiff"), by and
38 through its attorneys of record, and Defendants, UnitedHealthcare Insurance Company and
39 United Healthcare Services, Inc. (hereafter, "Defendants"), by and through their attorneys of
40 record, hereby stipulate and agree to the following:

41 1. Plaintiff stipulated to allow Defendants to respond to the Complaint [DOC 1] on or
42 before September 8, 2022.
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44 2. Defendants filed their Motion to Dismiss [DOC 29] on September 8, 2022.

1 3. The Response to Defendants' Motion is currently due on or before October 17, 2022, per
2 the stipulation of the parties.

3 4. Thereafter, Defendants filed their Motion to Stay Discovery [DOC 40] on September 29,
4 2022.

5 5. Plaintiff's Response to the Motion to Stay Discovery is due on or before October 13,
6 2022. Defendants' Reply to the Motion to Stay Discovery would be due on or before
7 October 20, 2022.

9 6. Given the overlap of the briefing schedule for the Motion to Stay Discovery and the
10 Motion to Dismiss, the parties have stipulated to extend the briefing schedule on the
11 Motion to Stay, making **Plaintiff's Response due on or before October 21, 2022, and**
12 **Defendants' Reply due on or before November 4, 2022.**

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7. The Motion to Stay is currently set for hearing in front of Magistrate Weksler on November 14, 2022.

Respectfully submitted,

DATED this 10th day of October, 2022.

DATED this 10th day of October, 2022.

By: /s/ Renee M. Finch

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By: /s/ Debra L. Spinelli

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IT IS SO ORDERED:

UNITED STATES MAGISTRATE

DATED: October 11, 2022